

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK**

In Re: John C. Szumowski

Debtor(s)

**Address: 2484 Ridge Road
Scotia, NY 12302**

**Case No.: 10-12431
Chapter 13**

**DEBTOR'S REQUESTS FOR INSPECTION AND FORENSIC TESTING
OF ORIGINAL DOCUMENTS**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure which is made applicable to this proceeding by Rule 7034 of the Federal Rules of Bankruptcy Procedure, ("Rules") John C. Szumowski, ("debtor" or "Szumowski"), by and through his attorney, Ronald J. Kim, hereby demands that BAC Home Loan Servicing, LP ("BAC" or "claimant"), within thirty (30) days after service, produce the following documents for inspection and forensic testing and otherwise respond to the following requests:

INSTRUCTIONS

1. You are hereby required to answer each request separately and fully in writing, under oath in accordance with the Rules.
2. If you fail to respond in a timely fashion, you waive any objection to the requests and the debtor may seek from the Court an appropriate sanction pursuant to Rule 7037.
3. Any objection to a request or part of a request must clearly state the specific grounds for the objection.

DEFINITIONS

1. "You" means BAC Home Loan Servicing, LP, its agents, employees, attorneys, servants, predecessors and/or successors in interest and all others acting on its behalf.
2. "Debtor" or "Szumowski" means the John C. Szumowski.
3. "Note" means the promissory note in the amount of \$125,000.00, dated September 9, 2004, and allegedly executed by the debtor.
4. "Mortgage" means the mortgage alleged to have been executed by the debtor on or about September 9, 2004, and allegedly securing real property located at 2484 Ridge Road, Scotia, New York.
5. "Proof of Claim" means Claim 2 filed on or about September 27, 2010, in the matter, In re: John C. Szumowski, #10-12431.
6. "Court" means the United States Bankruptcy Court, Northern District of New York.

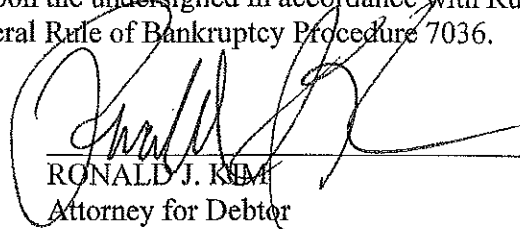
7. "HFF" means Home Funding Finders, Inc., its officers, directors, employees, servants, agents, representatives, divisions, partners, corporate parent, subsidiaries, successors in interest, assignees or affiliates and anyone else acting on its behalf.
8. "Countrywide" means Countrywide Home Loans, Inc. its officers, directors, employees, servants, agents, representatives, divisions, partners, corporate parent, subsidiaries, successors in interest, assignees or affiliates and anyone else acting on its behalf.
9. "MERSCORP" means MERSCORP, Inc., its officers, directors, employees, servants, agents, representatives, divisions, partners, corporate parent, subsidiaries, successors in interest, assignees or affiliates and anyone else acting on its behalf.
10. "MERS" means Mortgage Electronic Registration Systems, Inc., its officers, directors, employees, servants, agents, representatives, divisions, partners, corporate parent, subsidiaries, successors in interest, assignees or affiliates and anyone else acting on its behalf.

REQUESTS

1. Produce the original of the attached Exhibit 1 for inspection and forensic testing.
2. Produce the original of the attached Exhibit 2 for inspection and forensic testing.
3. Produce the original of the attached Exhibit 3 for inspection and forensic testing.
4. Produce the original of the attached Exhibit 4 for inspection and forensic testing.
5. Produce the original collateral file and/or legal file and/or investor file and/or mortgage file referring or relating to the debtor for inspection and forensic testing.
6. Produce any original note referring or relating to the debtor in your custody and control for inspection and forensic testing.
7. Produce any original mortgage referring or relating to the debtor in your custody and control for inspection and forensic testing.
8. Produce any original mortgage assignment or assignment of mortgage referring or relating to the debtor in your custody and control for inspection and forensic testing.

PLEASE TAKE NOTICE that a copy of the answers to the above-listed requests for inspection and forensic testing must be served upon the undersigned in accordance with Rule 36 of the Federal Rules of Civil Procedure and Federal Rule of Bankruptcy Procedure 7036.

Dated: Saratoga Springs, New York
March 16, 2011



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